

Exhibit B

From: [Mulherin, Joseph](#)
To: [Patrick Trainor, Esq.](#); [Starbuck, Emily](#)
Subject: RE: D'Ambly - Proposed Discovery Confidentiality Order
Date: Thursday, December 1, 2022 7:32:19 PM

Patrick,

Thank you for your email. Our disproportionate/irrelevance/over-breadth objections stem from you asking NYDN to search the email boxes of every employee at NYDN, including individuals who had no role in Mr. Exoo's termination. We are happy to meet and confer with you about your requests and our objections. What time works for you on Monday?

Best regards,
Joe

JOSEPH MULHERIN
Partner
McDermott Will & Emery LLP 444 West Lake Street, Suite 4000, Chicago, IL 60606-0029
Tel +1 312 899 7159 **Mobile** +1 312 593 3802 **Email** jmulherin@mwe.com
[Website](#) | [vCard](#) | [Twitter](#) | [LinkedIn](#)
Karen Wagner, Assistant to Joseph Mulherin
Tel 1 312 899 6865 **Email** kwagner@mwe.com

From: Patrick Trainor, Esq. <pt@PTESQ.COM>
Sent: Thursday, December 1, 2022 7:15 PM
To: Starbuck, Emily <Estarbuck@mwe.com>
Cc: Mulherin, Joseph <Jmulherin@mwe.com>
Subject: Re: D'Ambly - Proposed Discovery Confidentiality Order

[External Email]

The responses are a joke right? I mean you're claiming that producing the name(s) of the person(s) who disclosed D'Ambly's confidential personnel information to Exoo is overly burdensome? That's a five-word question. Do you want me to tell you those name(s) and their contact information to ease your burden?

And then you're objecting to number 3 because I asked for *every* (your emphasis), but number 4, similar question you respond by stating you are not aware of any responsive documents? Firstly, that's bush league and you know it. Secondly, I am aware of responsive documents that are in your client's possession, so there is no way you are not aware of responsive documents. Please amend because it will get awkward if I supplement my production with communications between Exoo and your client concerning D'Ambly and his termination. Personal cells and emails count.

See you in NY Post.

Sincerely,